

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DONALD BERDEAUX and CHRISTINE GRABLIS, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

-against-

ONECOIN LTD., RUJA IGNATOVA, KONSTANTIN IGNATOV, SEBASTIAN GREENWOOD, MARK SCOTT, IRINA ANDREEVA DILINSKA, DAVID PIKE, and NICOLE J. HUESMANN,

Defendants.

Case No. 19 Civ. 4074 (VEC)

Hon. Valerie E. Caproni

NOTICE OF MOTION

**ORAL ARGUMENT
REQUESTED**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Defendant Mark S. Scott, by and through his undersigned counsel, moves for an order dismissing Plaintiffs' First Amended Class Action Complaint (ECF No. 40), with prejudice, for lack of personal jurisdiction and for failure to state a claim, under Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure.

WHEREFORE, Defendant Mark Scott respectfully requests that the Court grant this Motion, as well as such other and further relief as the Court deems just and proper.

Dated: New York, New York
June 25, 2020

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